William J. Barrett
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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re :

: Chapter 11 DELPHI CORPORATION, et al., :

: Case No. 05-44481 (RDD)

Debtors. : (Jointly Administered)

\_ :

#### NOTICE OF RECLAMATION DEMAND OF JOHNSON INDUSTRIES, INC.

Please be advised that a Notice of Reclamation Demand on behalf of Johnson Industries, Inc. was served on October 18, 2005 on the Debtors and their attorneys of record, John Wm. Butler, Jr. and Kayalyn A. Marafioti, Skadden, Arps, Slate, Meagher & Flom LLP. A true and correct copy of the Notice of Reclamation Demand is attached hereto as Exhibit "A" and incorporated herein by reference for all purposes.

#### JOHNSON INDUSTRIES, INC.

Dated: October 19, 2005

By: /s/ William J. Barrett

William J. Barrett Kimberly J. Robinson Barack Ferrazzano Kirschbaum Perlman & Nagelberg LLP 333 West Wacker Drive, Suite 2700 Chicago, IL 60606

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Attorneys for Johnson Industries, Inc.

#### **CERTIFICATE OF SERVICE**

I hereby certify that the Notice of Reclamation Demand of Johnson Industries, Inc., referenced herein as Exhibit A, was duly served on October 18, 2005 as indicated to the parties below:

John Wm. Butler Jr.
John K. Lyons
Ron E. Meisler
Skadden, Arps, Slate, Meagher & Flom LLP
333 West Wacker Drive
Suite 2100
Chicago, IL 60606
(served via messenger hand delivery)

Kayalyn A. Marafioti Thomas J. Matz Skadden, Arps, Slate, Meagher & Flom LLP Four Times Square New York, NY 10036 (served via overnight delivery)

David M. Sherbin, Vice President and General Counsel Delphi Corporation 5725 Delphi Drive Troy, MI 48098 Facsimile: 248-813-2491

Facsimile: 248-813-2491 Facsimile: 248-813-2670

(served via facsimile and overnight delivery)

/s/ William J. Barrett
William J. Barrett

# **EXHIBIT A**

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### BARACK FERRAZZANO KIRSCHBAUM PERLMAN & NAGELBERG LLP

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October 18, 2005

Delphi Corporation - Legal Department Attn: David M. Sherbin, Vice President and General Counsel 5725 Delphi Drive Troy, MI 48098

Facsimile: 248-813-2491 Facsimile: 248-813-2670

(served via facsimile and overnight delivery)

John Wm. Butler, Jr.
John K. Lyons
Ron E. Meisler

Skadden, Arps, Slate, Meagher & Flom LLP 333 West Wacker Drive, Suite 2100

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(served via messenger hand delivery)

Kayalyn A. Marafioti Thomas J. Matz

Skadden, Arps, Slate, Meagher & Flom LLP

Four Times Square New York, NY 10036

(served via overnight delivery)

Re: In re Delphi Corporation, et al, Case No. -5-44481 Reclamation Demand of Johnson Industries, Inc.

Dear Mr. Sherbin and Counsel:

We are counsel to Johnson Industries, Inc. ("Johnson") and we have been authorized to send this reclamation demand on behalf of Johnson. Pursuant to 11 U.S.C. § 546(c), Section 2-702(2) of the Uniform Commercial Code, and other applicable law, this letter serves as notice to Delphi Corporation and/or its subsidiaries (the "Debtors") that Johnson sold goods to the Debtors in the ordinary course of Johnson's business, and that Johnson is hereby demanding the return of goods received by the Debtors on or after September 28, 2005. The goods that are the subject of this reclamation demand are included in the invoices listed on the attachment hereto (the "Goods"). Copies of invoices and proofs of delivery will be supplied upon request. By this demand, you are instructed to immediately inventory the Goods and keep the Goods segregated from all other inventory, machinery and equipment. Further, you are not permitted to use, sell, encumber or transfer the Goods to any other party.

Please contact the undersigned to make immediate arrangements for the return of the Goods.

Very truly yours

Kimberly F. Robinson

cc: Kathleen Eidbo, Esq., Genuine Parts Company

EXHIBIT

A

JI Delphi Receivable

Invoice Number	Invoice/ Delivery Date	Amount
c79204	9/30/2005	6,810.08
c81569	10/7/2005	3,190.94
	-	10,001.02